

FILED

JUN -7 2018

U.S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

VS.

BRANDON WILLIAMS and
LAREE DUNNING,

Defendants.

4:18CR497 SNLJ/DDN

INDICTMENT – COUNT I
MAIL FRAUD 18 U.S.C. 1341

Introduction

1. At all relevant times, the Defendants resided in Marion County within the Eastern District.
2. At all relevant times, the Defendant Brandon Williams worked as the administrator of the Blessing Center, a retirement home and rehabilitation center located in Knox County, Missouri, which lies within the Eastern District of Missouri.
3. At all relevant times, D.R. resided at the Blessing Center.

The Credit Card Account

4. On or about July 22, 2016, the Defendants applied for a credit card account (the “account”) in the name of D.R. using, among other things, D.R.’s name and social security account number to complete the application. In addition to using the means of identification of D.R. without permission or authorization, the Defendants falsely claimed D.R. would be responsible for charges to the account

and would honor the various terms of the agreement.

5. The foregoing credit application called for an electronic mail account associated with D.R. On or about April 13, 2016, an electronic mail address containing the name of D.R. was created by means of a mobile phone number associated with Defendant Laree Dunning.
6. In reliance on the foregoing false and material representations made in the credit application, Chase Bank, N.A. agreed to extend to D.R. in the form of a Chase Visa Credit Card Account ending in 3075. As a result of the false application, Chase Bank, N.A. placed material containing a credit card corresponding to the account in an authorized depository for mail matter in the State of Delaware which material was in fact delivered to the Blessing Center to the attention of D.R. on or about July 26, 2016.
7. On or about July 26, 2016, the Defendants intercepted the mail material containing the aforementioned credit card and activated the card.
8. On or about July 28, 2018, Defendant Laree Dunning made an unauthorized purchase at a Wal-Mart store located in Adair County within the Eastern District of Missouri.
9. On or about July 29, 2016, Defendant Brandon Williams made an unauthorized purchase at a Lowes store located in Marion County within the Eastern District of Missouri.

The Offense Conduct

10. Between on or about July 22, 2016 and continuing through on or about July 29, 2016, in the Eastern District of Missouri and elsewhere, the Defendants,

**BRANDON WILLIAMS and
LAREE DUNNING,**

having devised a scheme and artifice to defraud another of money and valuable property by means of false and fraudulent pretenses, representations or promises, did caused to be deposited material at a post office or authorized depository for mail matter or by means of a private interstate commercial carrier in furtherance of and for the purpose of executing said scheme.

In violation of Title 18, United States Code Section 1341 and 2.

COUNT II – Aggravated Identity Theft

11. The allegations contained in Paragraphs 1 through 10 are hereby realleged and incorporated by reference.

12. On or about July 22, 2016, in the Eastern Distreict of Missouri and elsewhere, the Defendant,

BRANDON WILLIAMS,

during and in relation to the Mail Fraud alleged in Count I, knowingly transferred, possessed and used without lawful authority the means of identification of D.R.

In violation of Title 18, United States Code Section 1028A(a)(1).

A TRUE BILL

FOREPERSON

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